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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 NORTHSHORE SHEET METAL, INC.,

Case No.

10 Plaintiff,

11 v.

12 SHEET METAL WORKERS
13 INTERNATIONAL ASSOCIATION,
LOCAL 66,

14 Defendant.

**DECLARATION OF
CHRISTOPHER L. HILGENFELD IN
SUPPORT OF NORTHSHORE'S
MOTION FOR TEMPORARY
RESTRAINING ORDER AND ORDER
FOR INJUNCTIVE RELIEF**

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16 I, CHRISTOPHER L. HILGENFELD, declare as follows:

17 1. I am over the age of eighteen (18) years and I am competent to testify if
18 called upon to do so.

19 2. I am an attorney at Davis Grimm Payne & Marra, counsel of record for
20 Plaintiff Northshore Sheet Metal, Inc. ("Northshore" or "Defendant"), admitted to practice
21 in the U.S. District Court, Western District of Washington. I am the lead attorney
22 representing Northshore Sheet Metal, Inc. in the above-captioned matter, and I make this
23 declaration based upon my personal knowledge and review of the files and records herein.
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*DECLARATION OF CHRISTOPHER L.
HILGENFELD - Page 1
CASE NO.*

DAVIS GRIMM PAYNE & MARRA

701 Fifth Avenue, Suite 4040
Seattle, WA 98104
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1 3. Attached hereto as **Exhibit 4** is a true and correct copy of the letter from
2 Daniel Hutzenbiler, regarding Article 3.5 of the parties' Settlement Agreement, dated July 9,
3 2015. Mr. Hutzenbiler represents Sheet Metal Workers International Association, Local 66
4 ("Local 66" or "Union").

5 4. Attached hereto as **Exhibit 5** is a true and correct copy of my letter to Mr.
6 Hutzenbiler in response to the Union's July 9, 2015, letter, dated July 13, 2015.

7 5. Attached hereto as **Exhibit 6** is a true and correct copy of Mr. Hutzenbiler's
8 e-mail and attached redacted spreadsheet (names and alleged amount owing have been
9 redacted) regarding alleged amounts still owed to employees under §3.5 of the Settlement
10 Agreement, dated July 20, 2015.

11 6. Attached hereto as **Exhibit 7** is a true and correct copy my letter to
12 Mr. Hutzenbiler requesting clarification and additional information regarding documents
13 provided by the Union, dated July 28, 2015.

14 7. Attached hereto as **Exhibit 8** is a true and correct copy of Mr. Hutzenbiler's
15 letter regarding the parties' August 7, 2015 negotiations and Local 66's position regarding
16 bargaining, dated August 13, 2015.

17 8. Attached hereto as **Exhibit 9** is a true and correct copy of my letter faxed to
18 Daniel Hutzenbiler and Tim Carter regarding the Union's current strike activity, dated
19 August 20, 2015.

20 9. Attached hereto as **Exhibit 10** is a true and correct copy of my e-mail to Mr.
21 Hutzenbiler in follow-up to my voice message providing notice that Northshore would file
22 for injunctive relief in federal court to stop the Union's strike, dated August 21, 2015.
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10. Attached hereto as **Exhibit 11** is a true and correct copy of the faxed letter from Mr. Hutzenbiler responding to Northshore's letter of August 20, 2015 regarding the Union's contractual breach, dated August 21, 2015.

11. Attached hereto as **Exhibit 12** is a true and correct copy of Mr. Hutzenbiler's e-mail regarding benefits payments and arbitration procedure issues, dated August 21, 2015.

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing statements are true and accurate.

Dated at Seattle, Washington this 22 day of AUGUST, 2015.

Christopher L. Hilgenfeld